

Appl. No. 10/005,972  
Response Dated January 19, 2006  
Reply to Final Office Action of October 19, 2005

**REMARKS**

Claims 1-28 are pending in this application. Although Applicant disagrees with the broad grounds of rejection set forth in the Office Action, Applicant has amended the claims in order to facilitate prosecution on the merits. No new matter has been added. Favorable reconsideration and allowance of the pending claims are respectfully requested.

**35 U.S.C. § 102(b) Rejection**

Claims 1-4, 8, 9, 13-18, and 22-28 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6, 119, 171 to Alkhatib ("Alkhatib"). Applicant respectfully traverses the rejection.

Independent claims 1 and 22 have been amended to recite "translating said external address by selecting one of said internal addresses associated with said security identifier using a list of security identifiers and a set of heuristics."

Independent claims 9 and 26 have been amended to recite "translating said external address by selecting one of said internal addresses associated with a security identifier from said list of security identifiers using a set of heuristics."

Independent claim 15 has been amended to recite "a translation module to select an internal address for an encrypted packet having an external address and a security identifier using said list of security identifiers and a set of heuristics."

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Regarding address translation, Alkhatib, in relevant part, states:

FIG. 11 describes one exemplar embodiment for performing the step of translating the destination domain name to a local address (step 506 of FIG. 10). Other suitable methods of translating a domain name can also be used. Translating a domain name can include less than all of the steps of FIG. 11. In step 512, DNR 138 looks up the domain name in a DNR table stored in its memory or other storage device. The DNR table includes domain names and corresponding local addresses. In one embodiment, the DNR table could also include Ethernet addresses. It is also possible that the local network includes multiple DNRs, forming a tree. Thus, the entry in the DNR table for a particular domain name could be just an address for another DNR. The packet would then be sent to another DNR, and the second DNR that would then use the domain name to find the final (or next) local address to the destination or another DNR, etc. The DNR table can be set up manually by the administrator for the network or may be set up automatically through embedded software, firmware or hardware.

In step 514, the DNR determines whether a record for the domain name was found. If no record was found, then an error message is sent back to host 150 in step 516. If a record is found, the global address for DNR 138 in the IP packet is replaced with the local address in the table. In step 520, the checksum for the IP header is adjusted if necessary. Since the destination IP address has changed in the header, the checksum may need to be adjusted accordingly. If the application incorporates information used by the IP packet into its data payload, such application packets may need to be adjusted as a result of the change in destination IP address.

When a packet is received by a host, the Network Layer passes the source and destination domain names to the Transport Layer (at least once for each connection). The Transport Layer may pass the source and destination domain names to the Application Layer. Any of the layers can use the source's domain name to send a reply.

Applicant respectfully submits that to anticipate a claim under 35 U.S.C. § 102(b), the cited reference must teach every element of the claim. *See e.g.*, MPEP § 2131. From the above, Alkhatib clearly fails to teach or suggest translating an external address to an internal address using a list of security identifiers and a set of heuristics. For at least this reason, Applicant submits that Alkhatib fails to teach each and every element recited in claims 1, 9, 15, 17, 22 and 26, as amended, and that such claims are allowable.

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Furthermore, Applicant submits that claims 2-4, 8, 13, 14, 16, 18, 23-25, 27, and 28 are allowable by virtue of their dependency, as well as on their own merits.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 35 U.S.C. § 102(b) rejection of claims 1-4, 8, 9, 13-18, and 22-28.

### **35 U.S.C. § 103(a) Rejection**

Claims 5-7, 10-12, and 19-21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Alkhatib in view of EP 1130846 A2 ("Nexland"). Applicant respectfully traverses the rejection.

Claims 5-7, 10-12, and 19-21 depend from one of independent claims 1, 9, 15, and 17. The Alkhatib reference fails to disclose all the elements of independent claims 1, 9, 15, and 17, as previously discussed. Furthermore, Nexland also fails to teach or suggest translating an external address to an internal address using a list of security identifiers and a set of heuristics. Applicant submits, therefore, that claims 1, 9, 15, and 17, as well as claims 5-7, 10-12, and 19-21, are non-obvious and patentable over Alkhatib and Nexland, whether taken alone or in combination.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the 35 U.S.C. § 103(a) rejection of claims 5-7, 10-12, and 19-21.

### **Conclusion**

It is believed that claims 1-28 are in allowable form. Accordingly, a timely Notice of Allowance to this effect is earnestly solicited.

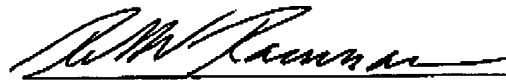
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Applicant does not otherwise concede, however, the correctness of the Office Action's rejection with respect to any of the dependent claims discussed above. Accordingly, Applicant hereby reserves the right to make additional arguments as may be necessary to further distinguish the dependent claims from the cited references, taken alone or in combination, based on additional features contained in the dependent claims that were not discussed above. A detailed discussion of these differences is believed to be unnecessary at this time in view of the basic differences in the independent claims pointed out above.

The Examiner is invited to contact the undersigned at 724-933-5529 to discuss any matter concerning this application.

Respectfully submitted,

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Under 37 CFR 1.34(a)

Dated: January 19, 2006

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Deborah L. Higham

1/19/06  
Date